

**Before the
Federal Communications Commission
Washington, D.C. 20054**

In the Matter of)	
)	WT Docket No. 02-378
Region 20 (District of Columbia, Maryland and)	
Northern Virginia) 700 MHz Regional Plan Amendment)	

COMMENTS OF THE COMMONWEALTH OF VIRGINIA

The Commonwealth of Virginia, Department of State Police (“Commonwealth”), by its counsel, hereby submits comments on behalf of its Statewide Agencies Radio System (“STARS”) in response to the Commission’s Public Notice issued September 21, 2015 (DA 15-054) in the above matter, on proposed amendments to the Region 20 700 MHz Public Safety Plan.

INTRODUCTION

STARS is a twenty-two state agency public safety grade statewide integrated voice and data system. STARS uses a digital trunked VHF narrowband system, which relies heavily on cross band 700 MHz digital vehicular repeater units (DVRS) in over 3,000 public safety vehicles to support public safety communications. The Commonwealth, on behalf of STARS, wishes to offer comments in support of the proposed modifications to the Region 20 700 MHz Public Safety Plan for General Use Spectrum in the 769-775/799-805 MHz Band (the “Plan Amendments”),

COMMENTS

The Commonwealth applauds the efforts of the Region 20 700 MHz Regional Planning Committee in designing a 700 MHz regional plan modification which meets the public safety needs of the Region.

Given the intense demand for frequencies in the Baltimore - District of Columbia – northern Virginia area, reaching a consensus on public safety channel allocations is not always easy.

The Commonwealth believes that Regional Planning Committee's reserve channel allotments (Exhibit H to the revised Plan) and spectrum re-allotments and reservations (Exhibit I to the revised Plan) are a reasonable and balanced allocation.

The Commonwealth is satisfied with the reserve channel allotments in Appendix H, including the primary assignment of eight channels to Baltimore, but assigning these same channels for use in northern Virginia by the Commonwealth, subject to a 3 watt power limit. This type of creative assignment structure provides the greatest use of these channels in a market with great channel scarcity.

Since not only all participating jurisdictions in Region 20, but also all adjacent regions, have agreed to the amendments, the Commonwealth urges the Commission to accept the Plan.

CONCLUSION

The modified Region 20 Plan meets the public safety needs of the Region and has been agreed to by all the participating jurisdictions and surrounding 700 MHz Regional Planning Committees. Given this unanimous support, the Commission should accept the Plan.

Respectfully submitted,

COMMONWEALTH OF VIRGINIA
DEPARTMENT OF STATE POLICE

By



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Dated: October 20, 2015

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of October, 2015, a copy of the foregoing
Comments of the Commonwealth of Virginia was sent by email to john.evanoff@fcc.gov.



Peter E. Broadbent, Jr.